

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 2:19-cr-458-WKW-WC
)	
CHARLES BENNETT SALTER, III)	

MOTION FOR DETENTION

Comes now the United States of America, by and through Louis V. Franklin, Sr., United States Attorney for the Middle District of Alabama, and pursuant to 18 U.S.C. § 3142(e) and (f) moves for detention for the above-captioned defendant.

1. **Eligibility of Cases**

This case is eligible for a detention order because this case involves:

_____	crime of violence (18 U.S.C. § 3156)
_____	10 + year federal crime of terrorism (18 U.S.C. § 2332b(g)(5)(B))
_____	Maximum sentence of life imprisonment or death
_____	10 + year drug offense
_____	Felony, with two prior convictions in the above categories
<u> X </u>	Felony involving a minor victim
_____	Felony involving possession or use of a firearm or other destructive device (as defined by 18 U.S.C. § 921) or any other dangerous weapon
_____	Failure to register as a sex offender (18 U.S.C. § 2250)
<u> X </u>	Serious risk the defendant will flee
_____	Serious risk of obstruction of justice

2. **Reason for Detention**

The Court should detain defendant because there are no conditions of release which will reasonably assure:

- X Defendant's appearance as required
- X Safety of any other person and the community

3. **Rebuttable Presumption**

The United States will invoke the rebuttable presumption against defendant under Section 3142(e).

- Previous conviction for "eligible" offense committed while on pretrial bond, and a period of five years has not elapsed from defendant's conviction or release from imprisonment for the offense described.
- Probable cause to believe defendant committed 10 + year drug offense.
- Probable cause to believe defendant committed an offense in which a firearm was used or carried under Section 924(c).
- Probable cause to believe defendant conspired to kill, kidnap, maim, or injure persons in a foreign country as prohibited under 18 U.S.C. § 956(a).
- Probable cause to believe defendant committed act of terrorism transcending national boundaries (18 U.S.C. § 2332) or a 10 + year federal crime of terrorism as defined in 18 U.S.C. § 2332b(g)(5)(B)).
- X Probable cause to believe defendant committed an offense involving a minor victim under 18 U.S.C. § 2252A(a)(2).

4. **Time for Detention Hearing**

The United States requests the Court conduct the detention hearing:

- At the initial appearance
- X After continuance of 3 days

The Government requests leave of Court to file a supplemental motion with additional grounds or presumption for detention should this be necessary.

Dated this 16th day of December, 2019.

Respectfully Submitted,

LOUIS V. FRANKLIN, SR.
UNITED STATES ATTORNEY

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